

505 Sansome Street
Suite 900
San Francisco
California 94111

GOODIN, MACBRIDE,
SQUERI, RITCHIE & DAY, LLP
Attorneys at Law

Telephone
415/392-7900
Facsimile
415/398-4321

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John L. Clark

Writer's Direct Line
415/765-8443

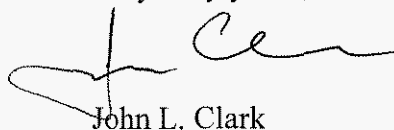
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Certification of CPNI Filing
EB-06-TC-060/EB Docket No. 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is a compliance and accompanying statement of Utility Telephone, Inc. for the year ended December 31, 2005.

Very truly yours,



John L. Clark

CERTIFICATE OF COMPLIANCE

I, Jason Mills, certify, on behalf of Utility Telephone, Inc. (the "Company"), that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934 and the Federal Communications Commission rules implementing Section 222.

By: 

Title: Jason Mills, President

Dated: February 3, 2006

STATEMENT OF COMPLIANCE PROCEDURES

Utility Telephone, Inc. (the "Company") has established operating procedures to protect the privacy of Customer Proprietary Network Information ("CPNI") as follows:

(1) The Company does not make use of CPNI for sales or marketing purposes, except for:

- (i) marketing communications services that are within the same category of services to which the customer already subscribes;
- (ii) marketing the provision of CPE, call answering, voice mail or messaging;
- (iii) marketing of inside wiring services, custom calling features, and other services that are adjunct-to-basic services.

(2) The Company has trained all personnel who have access to CPNI of the uses for which CPNI may be made and on restrictions in the use of CPNI. The Company has a no tolerance policy for violations and will discipline any individual who has been found in violation of CPNI requirements. Intentional or grossly negligent violations will result in termination. In other cases, discipline, up to and including termination, will apply, as appropriate.

(3) The Company discloses CPNI to third parties only pursuant to lawful process. In the event of any uncertainty, the Company's policy is to consult with counsel before responding to any request for CPNI from a third party.